

# EXHIBIT

# A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

**Case No. 5:22-CV-00068-BO**

YOLANDA IRVING, et al.,

Plaintiffs,

v.

THE CITY OF RALEIGH, et al.,

Defendants.

**SECOND AMENDED CROSS-NOTICE  
OF DEPOSITION OF EMANCIPATE  
NC, INC., PURSUANT TO F. R. CIV. P.  
30(b)(6) AND REQUEST FOR  
PRODUCTION PURSUANT TO F. R.  
CIV. P. 30(B)(2) AND 34**

PLEASE TAKE NOTICE that pursuant to the provisions of Rules 30 and 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Omar I. Abdullah will take the deposition of **Plaintiff Emancipate NC, Inc.**, by and through its designated officer, director, managing agent, or other designee, on **Thursday, February 2, 2023, beginning at 10:00 a.m.**, at the law offices of Ellis & Winters, 4131 Parklake Avenue, Suite 400, Raleigh, NC 27612 or at such other time and location as may be agreed upon by the parties.

Pursuant to Rule 30(b)(6), Plaintiff Emancipate NC, Inc., shall designate one or more of its officers, directors, managing agents, or other persons to testify on its behalf concerning the following topic:

1. The September 23, 2021 community forum at Chavis Community Center organized and/or attended by Emancipate NC, Inc.

2. Communications between Emancipate NC, Inc., or its employees or agents, and the Wake County District Attorney's Office concerning Omar Abdullah from 2021 through present.

The deposition will be taken before a notary public or some other officer duly authorized by law to take depositions and will be recorded by stenographic and/or videotaped means. The deposition will continue from day to day until complete

Pursuant to Rules 30(b)(2) and 34 of the Federal Rules of Civil Procedure, Plaintiff Emancipate NC, Inc., is requested to produce for inspection and copying at the time of the deposition the documents described below which are in the possession, custody, or control of Plaintiff Emancipate NC, Inc., or which Plaintiff Emancipate NC, Inc. is aware:

1. All written materials prepared or disseminated by Emancipate NC, Inc. at the September 23, 2021 community forum at Chavis Community Center organized and/or attended by Emancipate NC, Inc.
2. Any recording, and any transcript thereof, of the September 23, 2021 community forum at Chavis Community Center organized and/or attended by Emancipate NC, Inc.
3. All written communications between Emancipate NC, Inc., or its employees or agents, and the Wake County District Attorney's Office concerning Omar Abdullah from 2021 through present.

This the 23rd day of January, 2023.



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Daniel E. Peterson (N.C. State Bar No. 41251)  
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*Counsel for Defendant Omar Abdullah*

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date, the foregoing *Second Amended Cross-Notice of Deposition of Emancipate NC, Inc., Pursuant to F. R. Civ. P. 30(B)(6) and Request for Production Pursuant to F. R. Civ. P. 30(B)(2) and 34* was served upon counsel of record via e-mail and First Class Mail as follows:

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*Counsel for SEU Officer Defendants*

This the 23rd day of January, 2023.



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